EXHIBIT 420

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1
       IN THE UNITED STATES DISTRICT COURT
2
        FOR THE EASTERN DISTRICT OF OHIO
3
                EASTERN DIVISION
5
    IN RE: NATIONAL : MDL NO. 2804
    PRESCRIPTION OPIATE :
    LITIGATION
7
                        : CASE NO.
    THIS DOCUMENT : 1:17-MD-2804
    RELATES TO ALL CASES:
                         : Hon. Dan A.
9
                           Polster
10
             Friday, January 4, 2019
11
12
    HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
             CONFIDENTIALITY REVIEW
13
14
                 Videotaped deposition of
    DEBRA CHASE, taken pursuant to notice,
15
    was held at the law offices of Morgan
    Lewis & Bockius, 1111 Pennsylvania
16
    Avenue, NW Washington, DC 20004,
    beginning at 10:17 a.m., on the above
17
    date, before Amanda Dee Maslynsky-Miller,
    a Certified Realtime Reporter.
18
19
20
21
22
            GOLKOW LITIGATION SERVICES
        877.370.3377 ph | 917.591.5672 fax
23
                deps@golkow.com
24
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1 2 INDEX
3
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Testimony of: DEBRA CHASE
5
By Mr. Powers 7
6 7
8
9 EXHIBITS
10
¹¹ NO. DESCRIPTION PAGE
12 RiteAid-Chase
Exhibit-1 Rite_Aid_OMDL_0016495-498 40
RiteAid-Chase
14 Exhibit-2 Rite Aid OMDL 0016297-329 85
¹⁵ RiteAid-Chase — — —
Exhibit-3 Rite_Aid_OMDL_0012503-505 10
16
RiteAid-Chase
17 Exhibit-4 Rite_Aid_OMDL_0049994-50031 1 18 RiteAid-Chase
Exhibit-5 Rite Aid OMDL 0016955-956 11
19 Exhibit 5 Rite_Rite_6WBE_6010933 930 TF
RiteAid-Chase
20 Exhibit-6 Rite_Aid_OMDL_0003641 129
21 RiteAid-Chase Exhibit 7 Pite Aid OMDI 0014370 452 14
Exhibit-7 Rite_Aid_OMDL_0014379-452 14
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² DEPOSITION SUPPORT INDEX
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3 4
 3 4 5 Direction to Witness Not to Answer
3 4
 3 4 5 Direction to Witness Not to Answer
 January Line Direction to Witness Not to Answer Page Line Page Line
5 Direction to Witness Not to Answer Page Line Page Line None
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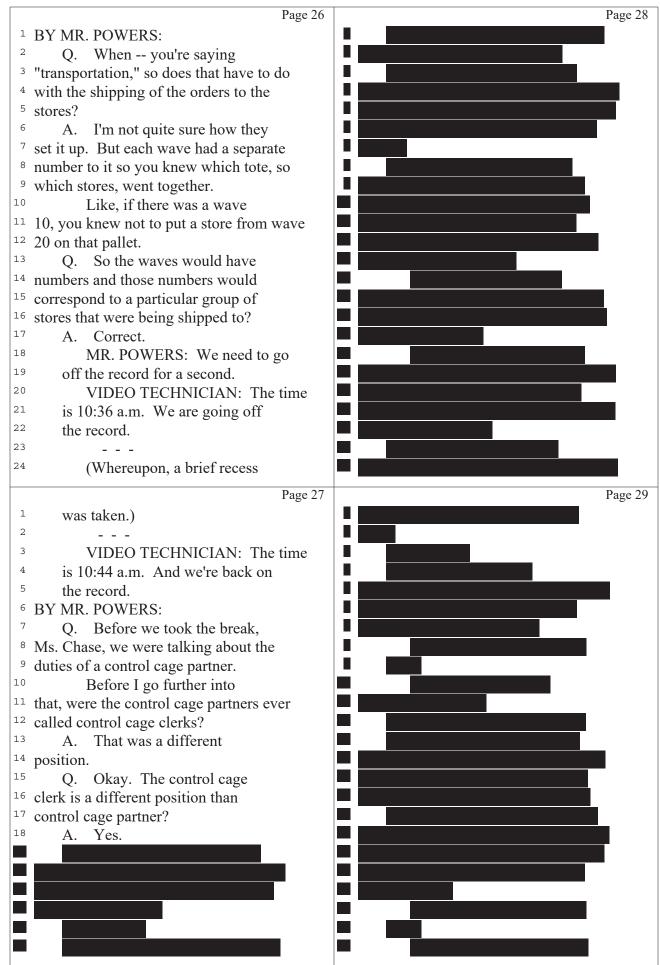
	Page 6		Page
1		1	A. Yes. Debra Ann Chase.
2	(It is hereby stipulated and	2	Q. Can you spell it, please?
3	agreed by and among counsel that	3	A. D-E-B-R-A, A-N-N, C-H-A-S-E.
4	sealing, filing and certification	4	Q. And we've got a couple of
5	are waived; and that all	5	people listening on the phone and in the
6	objections, except as to the form	6	room, so I'd ask you to just keep your
7	of the question, will be reserved	7	
8	until the time of trial.)	8	Is that all right?
9		9	A. Uh-huh.
10	VIDEO TECHNICIAN: We are	10	Q. And that your answer
11	now on the record. My name is	11	
12	Daniel Holmstock. I'm the	12	instructions.
13	videographer for Golkow Litigation	13	Because we do have a court
14	Services. Today's date is January	14	reporter taking down the testimony here
15	4th, 2019. The time on the video	15	· · · · · · · · · · · · · · · · · · ·
16	screen is 10:17 a.m.	16	
17	This video deposition is	17	, c
18	being held at the law offices of	18	opposed to nods of the head, uh-huhs,
19	Morgan Lewis, at 1111 Pennsylvania	19	uh-uh, things like that.
20	Avenue, Northwest, in Washington,	20	Is that all right?
21	D.C. in the matter of In Re	21	
22		22	•
23	National Prescription Opiate		Q. If, for any reason, you
23	Litigation.	23	den i understand a question i in using
24	The case is pending before	24	today or require any sort of
	Page 7		Page
1	the United States District Court		clarification, explanation of the words
2	for the Northern District of Ohio,		I'm using or anything like that, you have
3	Eastern Division. The deponent is	3	to tell me and we'll get that matter
4			
	Debra Chase. Counsel will be	4	resolved before you answer the question.
5	noted on the stenographic record		resolved before you answer the question. Is that okay?
		4	resolved before you answer the question.
5	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who	4 5	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a
5 6	noted on the stenographic record for appearances. The court	4 5 6	resolved before you answer the question. Is that okay? A. Yes.
5 6 7	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who	4 5 6 7	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a
5 6 7 8 9	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who	4 5 6 7 8	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and
5 6 7 8 9	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath.	4 5 6 7 8	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it.
5 6 7 8 9 10	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having	4 5 6 7 8 9	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay?
5 6 7 8 9 10 11	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and	4 5 6 7 8 9 10	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering
5 6 7 8 9 10 11 12	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and	4 5 6 7 8 9 10 11	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that
5 6 7 8 9 10 11 12 13	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows:	4 5 6 7 8 9 10 11 12 13	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability
5 6 7 8 9 10 11 12 13 14	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows:	4 5 6 7 8 9 10 11 12 13 14	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my
5 6 7 8 9 10 11 12 13 14 15	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION The court reporter is Amanda Miller, who will now administer the oath.	4 5 6 7 8 9 10 11 12 13 14 15	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability
5 6 7 8 9 10 11 12 13 14 15 16 17	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION OR OF THE WORLD STREET OF TH	4 5 6 7 8 9 10 11 12 13 14 15	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No.
5 6 7 8 9 10 11 12 13 14 15 16 17 18	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION EXAMINATION OR OF THE POWERS: Q. Good morning, Ms. Chase. A. Good morning.	4 5 6 7 8 9 10 11 12 13 14 15 16	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No. Q. Do you understand that the
5 6 7 8 9 10 11 12 13 14 15 16 17 18	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION The court DEBRA CHASE, after having been duly sworn, was examined and testified as follows: DEBRA CHASE, after having been duly sworn, was examined and testified as follows: A Good morning. Q. Good morning, Ms. Chase. A. Good morning. Q. My name is Will Powers, and	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No. Q. Do you understand that the court reporter has sworn you in and
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION EXAMINATION OR Good morning, Ms. Chase. A. Good morning. Q. My name is Will Powers, and I represent the plaintiffs in this	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No. Q. Do you understand that the court reporter has sworn you in and you're under oath here just as you would
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION EXAMINATION OR Good morning, Ms. Chase. A. Good morning. Q. My name is Will Powers, and I represent the plaintiffs in this litigation.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No. Q. Do you understand that the court reporter has sworn you in and you're under oath here just as you would be in a courtroom at trial?
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION BY MR. POWERS: Q. Good morning, Ms. Chase. A. Good morning. Q. My name is Will Powers, and I represent the plaintiffs in this litigation. Before we get going, can you	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No. Q. Do you understand that the court reporter has sworn you in and you're under oath here just as you would be in a courtroom at trial? A. Yes.
5 6 7 8 9 110 111 1213 114 115 116 117 118 119 220 221 222 223	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION EXAMINATION OR Good morning, Ms. Chase. A. Good morning. Q. My name is Will Powers, and I represent the plaintiffs in this litigation. Before we get going, can you please state your full name and spell it	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No. Q. Do you understand that the court reporter has sworn you in and you're under oath here just as you would be in a courtroom at trial? A. Yes. Q. And because you're under
5 6 7 8 9 .0 .1 .2 .3 .4 .5 .6 .7 .8 .9 .9 .9 .9 .9 .9 .9 .9 .9 .9 .9 .9 .9	noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION BY MR. POWERS: Q. Good morning, Ms. Chase. A. Good morning. Q. My name is Will Powers, and I represent the plaintiffs in this litigation. Before we get going, can you	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No. Q. Do you understand that the court reporter has sworn you in and you're under oath here just as you would be in a courtroom at trial? A. Yes.

Highly Confidencial - Subject	
Page 10	
¹ intentionally misleading answer, you may	¹ degree from college?
² be subject to criminal or civil	² A. I did not.
³ penalties.	³ Q. Do you have any other
4 Do you understand that?	⁴ education beyond high school, besides the
⁵ A. Yes.	⁵ classes you took at Harford Community
⁶ Q. And as we go today, we can	6 College?
⁷ take breaks if you need them, but I just	7 MR. LAVELLE: Object to
8 ask that if there's a question pending,	8 form.
⁹ that you answer the question pending	⁹ THE WITNESS: Could you
¹⁰ before we take the break.	repeat that again?
Is that all right?	¹¹ BY MR. POWERS:
12 A. Yes.	Q. Any education did you
MR. LAVELLE: The witness	have any education beyond high school,
will consult with I reserve the	besides the some community college at
right to consult with counsel if	15 Harford Community College?
there's a privilege issue.	MR. LAVELLE: Same
17 BY MR. POWERS:	objection.
Q. That gets to my next	THE WITNESS: I've had some
19 instruction.	other education through the
Your counsel, from time to	²⁰ military.
21 time, may object to my questions. But	21 BY MR. POWERS:
²² I'm still entitled to an answer, unless	Q. What is the nature of that
²³ your counsel specifically instructs you	²³ education?
²⁴ not to answer.	²⁴ A. I'm sorry?
not to will with	Till Bolly.
Page 1	_
Do you understand that?	Q. What is the nature of that
Do you understand that? A. Yes.	Q. What is the nature of that education?
Do you understand that? A. Yes. Okay, Ms. Chase, I want to	 Q. What is the nature of that education? A. It pertained to the job that
Do you understand that? A. Yes. Okay, Ms. Chase, I want to start by going over your educational	 Q. What is the nature of that education? A. It pertained to the job that I had in the military.
Do you understand that? A. Yes. Okay, Ms. Chase, I want to	 Q. What is the nature of that education? A. It pertained to the job that
Do you understand that? A. Yes. Okay, Ms. Chase, I want to start by going over your educational	 Q. What is the nature of that education? A. It pertained to the job that I had in the military.
Do you understand that? A. Yes. Okay, Ms. Chase, I want to start by going over your educational background.	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here.
Do you understand that? A. Yes. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the
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Do you understand that? A. Yes. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes.	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992.
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high school?	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in?
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high school? A. Parkdale High in Riverdale,	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in? A. I was in the Army.
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high chool? A. Parkdale High in Riverdale, Maryland.	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in? A. I was in the Army. Q. During that time period when
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high school? A. Parkdale High in Riverdale, Maryland. And when did you graduate?	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in? A. I was in the Army. Q. During that time period when you were in the military, where were you
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high school? A. Parkdale High in Riverdale, Maryland. A. And when did you graduate? A. 1983.	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in? A. I was in the Army. Q. During that time period when you were in the military, where were you lately
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high school? A. Parkdale High in Riverdale, Maryland. A. And when did you graduate? A. 1983. Q. Do you have any education	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in? A. I was in the Army. Q. During that time period when you were in the military, where were you located? A. Starting from the beginning
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high school? A. Parkdale High in Riverdale, Maryland. A. And when did you graduate? A. 1983. Q. Do you have any education beyond high school?	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in? A. I was in the Army. Q. During that time period when you were in the military, where were you located? A. Starting from the beginning or
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high school? A. Parkdale High in Riverdale, Maryland. A. Parkdale High in Riverdale, A. 1983. Q. And when did you graduate? A. 1983. L. Do you have any education beyond high school? A. I have some college. Q. Where did you do your "some	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in? A. I was in the Army. Q. During that time period when you were in the military, where were you located? A. Starting from the beginning or Q. Sure. A. I was started in the
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high school? A. Parkdale High in Riverdale, Maryland. A. 1983. Q. And when did you graduate? A. 1983. Do you have any education beyond high school? A. I have some college. Q. Where did you do your "some college"?	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in? A. I was in the Army. Q. During that time period when you were in the military, where were you located? A. Starting from the beginning or Q. Sure. A. I was started in the Army. I went to Fort Jackson for basic
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high school? A. Parkdale High in Riverdale, Maryland. A. 1983. Q. And when did you graduate? A. 1983. Do you have any education beyond high school? A. I have some college. Q. Where did you do your "some college"? A. Harford Community College.	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in? A. I was in the Army. Q. During that time period when you were in the military, where were you located? A. Starting from the beginning or Q. Sure. A. I was started in the Army. I went to Fort Jackson for basic training. And then I went to Fort
Do you understand that? A. Yes. Q. Okay, Ms. Chase, I want to start by going over your educational background. Did you ever complete high school? A. Yes. Q. Where did you go to high school? A. Parkdale High in Riverdale, Maryland. A. 1983. Q. And when did you graduate? A. 1983. Do you have any education beyond high school? A. I have some college. Q. Where did you do your "some college"? A. Harford Community College. A. Harford Community College.	Q. What is the nature of that education? A. It pertained to the job that I had in the military. Q. Let me back up here. When were you in the military? A. From 1983 to 1992. Q. And what branch of the military were you in? A. I was in the Army. Q. During that time period when you were in the military, where were you located? A. Starting from the beginning or Q. Sure. A. I was started in the Army. I went to Fort Jackson for basic training. And then I went to Fort Benjamin, Harrison, Indiana for my
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1	Page 14	1	Page 16
	And then I went to Augsburg, Germany, and	1	11. 105.
	back to Aberdeen Proving Ground. And my	2	Q. What were the part-time jobs
	last station was in Kaiserslautern,	1	you had in addition to your full-time job
	Germany.	4	at Northeast Foods during the time period
5	Q. And you mentioned that you	5	of '92 to '98?
	got some education while you were in the	6	A. I worked for Rite Aid
7	1 11119 1	'/	pharmacy, the store, for a brief period.
8	What was the education you	8	And what else?
	got while you were in the Army?	9	I worked for Riley Mortgage
10	A. All the education I got was	1	Company part time in Columbia, Maryland
	pertaining to the particular job that I	11	as well.
	had.	12	Q. The Rite Aid store you
13	Q. What was the particular job		worked at part time before 1998, what
14	you had?	14	were you doing at the store?
15	A. It was called personnel	15	A. I was a cashier.
16	information systems.	16	Q. Was cashier your only job
17	Q. And what can you describe	17	j - 11 - 11 - 11 - 1 - 1 - 1 - 1 - 1 - 1
18	what personnel information systems was?	18	time in '98, at Rite Aid?
19	A. It actually entailed quite a	19	A. Yes.
20	few things. Mainly, like, data entry	20	Q. When you first started
21	information.	21	working at Rite Aid in 1998, what was the
22	Q. Then you said you left the	22	position that you had?
23	military in 1992, right?	23	A. When I first started, I was
24	A. Correct.	24	hired as the order fulfillment partner.
	Page 15		- Decc 17
	rage 13		Page 17
	O W/l 1: 1 1 -	1	O A 1 1
1	Q. Where what did you do	1	Q. And where were you working
2	after you left the military in 1992?	2	at that time as an order fulfillment
2	after you left the military in 1992? A. So forgive me, that kind of	2	at that time as an order fulfillment partner?
3 4	after you left the military in 1992? A. So forgive me, that kind of goes back to the education.	2 3 4	at that time as an order fulfillment partner? A. In the Rx area, pharmacy
2 3 4 5	after you left the military in 1992? A. So forgive me, that kind of goes back to the education. I did go to school again and	2 3 4 5	at that time as an order fulfillment partner? A. In the Rx area, pharmacy area.
2 3 4 5 6	after you left the military in 1992? A. So forgive me, that kind of goes back to the education. I did go to school again and took a couple of classes at Harford	2 3 4	at that time as an order fulfillment partner? A. In the Rx area, pharmacy area. Q. When you say "the Rx area,"
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1	Aid in '98 as an order fulfillment	1	order fulfillment partner, yes.
2	partner?	2	Q. When you started in 1998,
3	A. In the Rx department.	3	did you have any other titles besides
4	Q. But was that in Maryland?	4	order fulfillment partner?
5	Was that	5	A. At that time, no.
6	A. I'm sorry.	6	Q. So you testified that your
7	Yes, in	7	first responsibilities were working with
8	MR. LAVELLE: Object to	8	the A-frames.
9	form.	9	Did you ever switch
10	Please let the attorney	10	responsibilities or change
11	finish his question before you		responsibilities during your after you
12	start answering.		started in 1998 at Rite Aid?
13	THE WITNESS: I'm sorry.	13	MR. LAVELLE: Object to
14	Could you repeat that,	14	form.
15	please?	15	THE WITNESS: Yes, I did.
16	BY MR. POWERS:	16	BY MR. POWERS:
17	Q. Sure.	17	Q. When was that? When was the
18	In 1998 when you started	18	first time that happened?
19	working at Rite Aid full time, where,	19	A. Approximately six months to
20	physically, was the office you were	20	a year, I switched to another position.
21		21	Q. So that would have been some
22	A. That was in Aberdeen	22	time in 1999, probably, then?
23	Perryman, Maryland.	23	A. Approximately. I'm not
24	Q. And is that the distribution	24	exactly sure.
	Q. And is that the distribution		Chacity suic.
		-	
	Page 19		Page 21
1	center Rite Aid has in Perryman,	1	Q. And what was the position
1 2	center Rite Aid has in Perryman, Maryland?	1 2	Q. And what was the position you switched into?
	center Rite Aid has in Perryman, Maryland? A. Yes.	2	Q. And what was the position you switched into? A. At that time, I was moved
2	center Rite Aid has in Perryman, Maryland? A. Yes. Q. What were your job	2	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage.
3	center Rite Aid has in Perryman, Maryland? A. Yes. Q. What were your job responsibilities as an order fulfillment	2 3 4 5	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control
3	center Rite Aid has in Perryman, Maryland? A. Yes. Q. What were your job responsibilities as an order fulfillment partner in starting in 1998?	2 3 4 5	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage.
2 3 4 5	center Rite Aid has in Perryman, Maryland? A. Yes. Q. What were your job responsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx	2 3 4 5	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the
2 3 4 5 6	center Rite Aid has in Perryman, Maryland? A. Yes. Q. What were your job responsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx department, and I was responsible for	2 3 4 5 6	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the area where controlled drugs were held.
2 3 4 5 6 7	center Rite Aid has in Perryman, Maryland? A. Yes. Q. What were your job responsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx department, and I was responsible for running the A-frames.	2 3 4 5 6 7	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the area where controlled drugs were held. Q. And that's also at the
2 3 4 5 6 7 8	center Rite Aid has in Perryman, Maryland? A. Yes. Q. What were your job responsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx department, and I was responsible for	2 3 4 5 6 7 8	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the area where controlled drugs were held.
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	<i>3</i> 1		
	Page 22		Page 24
	consisted of a paperwork person or a		okay.
2	picker or a receiver or a replenisher.	2	Any other kind of reports
3	Q. Anything else besides a	3	that the paperwork control cage partner
4	paperwork person, picker, receiver or	4	ran besides the pick list?
5	replenisher?	5	MR. LAVELLE: Object to
6	A. Not as an actual control	6	form.
7	cage associate, no.	7	THE WITNESS: Yes, they did.
8	Q. And just so we're clear,	8	BY MR. POWERS:
9	when you when we talk about the	9	Q. What were those reports?
10	control cage, is that the area within the	10	A. They were what did we
11	distribution center that the controlled	11	call them? Sorry, right now it just kind
12	substances are held?	12	of slipped my mind, the actual name of
13	A. Yes.	13	it.
14	Q. So you mentioned four	14	Q. Can you describe it?
15	responsibilities of the control cage	15	A. It was a list of the all
	partner.	16	the stores that printed for a wave, what
17	The first one you mentioned	17	
18	was paperwork person.	18	Q. What is a wave?
19	Can you describe what you	19	A. The wave is set up by
20	mean by that?	20	transportation, and all the stores that
21	A. The paperwork person was	21	would be picked in that one area in
22	responsible for recording the tote		that one section, shall I say.
	numbers and store numbers onto a log for	23	I'm sorry, and going back to
	the totes that were picked for the	24	the other question you asked me, what was
			· ·
	Page 23	1	Page 25
	stores.		the name of the it was actually called
2	Q. Did the log have a name?		a tote list. The
3	A. Yes, it has a name. Right	3	Q. So the wave you're talking
4	now it kind of slips my mind.	1	about, is that like a wave of shipments
5	Q. Okay. Any other	5	that would go out to a particular set of
	responsibilities of the paperwork person?	6	stores, or is that a wave inside the
7	A. After they log the	7	distribution center itself?
8			
	information onto the sheet, then they	8	MR. LAVELLE: Object to
9	would palletize the totes after they were	9	form.
10	would palletize the totes after they were strapped and tied, according to that log.		form. THE WITNESS: I'm sorry,
	would palletize the totes after they were	9	form. THE WITNESS: I'm sorry, could you ask that again?
10	would palletize the totes after they were strapped and tied, according to that log. Q. Anything else? A. And run reports.	9	form. THE WITNESS: I'm sorry,
10	would palletize the totes after they were strapped and tied, according to that log. Q. Anything else?	9 10 11	form. THE WITNESS: I'm sorry, could you ask that again?
10 11 12 13	would palletize the totes after they were strapped and tied, according to that log. Q. Anything else? A. And run reports.	9 10 11 12	form. THE WITNESS: I'm sorry, could you ask that again? BY MR. POWERS:
10 11 12 13	would palletize the totes after they were strapped and tied, according to that log. Q. Anything else? A. And run reports. Q. What kind of reports did the	9 10 11 12 13	form. THE WITNESS: I'm sorry, could you ask that again? BY MR. POWERS: Q. Sure.
10 11 12 13 14 15	would palletize the totes after they were strapped and tied, according to that log. Q. Anything else? A. And run reports. Q. What kind of reports did the paperwork control cage partner run?	9 10 11 12 13 14 15	form. THE WITNESS: I'm sorry, could you ask that again? BY MR. POWERS: Q. Sure. You described a wave before
10 11 12 13 14 15	would palletize the totes after they were strapped and tied, according to that log. Q. Anything else? A. And run reports. Q. What kind of reports did the paperwork control cage partner run? A. The pick list that listed	9 10 11 12 13 14 15	form. THE WITNESS: I'm sorry, could you ask that again? BY MR. POWERS: Q. Sure. You described a wave before when you were talking about the pick
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10 11 12 13 14 15 16	would palletize the totes after they were strapped and tied, according to that log. Q. Anything else? A. And run reports. Q. What kind of reports did the paperwork control cage partner run? A. The pick list that listed the all the drugs that the store was supposed to get on that paper.	9 10 11 12 13 14 15 16	form. THE WITNESS: I'm sorry, could you ask that again? BY MR. POWERS: Q. Sure. You described a wave before when you were talking about the pick list. Can you describe what the
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10 11 12 13 14 15 16 17 18	would palletize the totes after they were strapped and tied, according to that log. Q. Anything else? A. And run reports. Q. What kind of reports did the paperwork control cage partner run? A. The pick list that listed the all the drugs that the store was supposed to get on that paper. Q. So the pick list was a list of all the drugs that any particular Rite Aid store was supposed to get in a	9 10 11 12 13 14 15 16 17 18	form. THE WITNESS: I'm sorry, could you ask that again? BY MR. POWERS: Q. Sure. You described a wave before when you were talking about the pick list. Can you describe what the wave means when you say "wave"? MR. LAVELLE: Object to
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10 11 12 13 14 15 16 17 18 19 20 21	would palletize the totes after they were strapped and tied, according to that log. Q. Anything else? A. And run reports. Q. What kind of reports did the paperwork control cage partner run? A. The pick list that listed the all the drugs that the store was supposed to get on that paper. Q. So the pick list was a list of all the drugs that any particular Rite Aid store was supposed to get in a shipment?	9 10 11 12 13 14 15 16 17 18 19 20 21	form. THE WITNESS: I'm sorry, could you ask that again? BY MR. POWERS: Q. Sure. You described a wave before when you were talking about the pick list. Can you describe what the wave means when you say "wave"? MR. LAVELLE: Object to form. THE WITNESS: Each wave had





Page 34

- 5 Q. When were you a control cage associate?
- A. The whole time I was there I was considered a control cage associate.
- Q. Is control cage associate ¹⁰ the same thing as control cage partner, 11 then?
- 12 Yes. A.
- 13 Q. When did you become a control cage clerk?
- 15 A. I can't remember the actual 16 date.
- 17 Q. Can you give me an 18 approximate date?
- 19 A. I'm not for sure. I would say within about a year after working there.
- 22 O. So some time before 2000?
 - A. Yes.

23

How long were you a control

- Q. Do you know how long you
- ² were a DEA coordinator for?
 - A. Approximately five years.
 - Q. So you were a DEA
- coordinator from about 2002 to about 2007; is that right?
 - A. Yes.
- Q. And after you stopped being
- the DEA coordinator, what was your position?
- A. I went back to the DEA 12 clerk.
- 13 Q. When you say you went back to DEA clerk, were you ever a DEA clerk
- before?

11

20

23

- 16 A. Yes. I was a DEA clerk
- before I became a coordinator.
- Q. So is control cage clerk the
- same as DEA clerk?
 - A. I'm sorry. Yes, it is.
- Q. I'm just trying to get a
- handle on the different titles.
 - A. Yes, I apologize.
 - When we say it, it is sort

Page 35

- ¹ cage clerk for?
- A. That, I don't remember the exact date either.
- 4 Are you still a control cage Q. 5 clerk?
- I am not.
- 7 O. What is your current position?
- A. My current position is a control cage associate.
- Q. Did you have any other positions besides control cage associate or control cage clerk?
- A. Yes.

15

- Q. What were those positions?
- A. After the control cage 16
- clerk, I became the DEA coordinator.
- Q. Do you know when you became 18 the DEA coordinator? 19
- 20 A. I'm sorry?
- 21 Q. When did you become the DEA coordinator?
- A. I don't remember the exact dates. Approximately 2002.

¹ of interchangeable.

- Q. So after being DEA
- ³ coordinator, you went back to being a DEA ⁴ clerk.

Page 37

- How long did you remain a
- ⁶ DEA clerk after approximately 2007?
- A. I can't quite remember. I
- ⁸ believe it was less than a year, because they changed the position -- they kind of
- got rid of the position as the clerk.
- Q. Did you transition to a new position at that point when they got rid of the DEA clerk position?
- A. Yes. Then I became the control cage lead.
- Q. And how long were you a 16
- control cage lead? 18 A. Up until currently -- I'm
- sorry, excuse me, until 2014. Q. And then after 2014, what
- was your position?
- A. Then I just pretty much ²³ became the DEA associate again, or
- ²⁴ partner.

			rarener confractionality keview
	Page 38		Page 40
1	Q. Tilla that 15 that what you	1	entire time there?
2	referred to earlier as the control cage	2	A. No.
3	associate?	3	Q. When you moved on to the
4	A. Correct.	4	position of DEA coordinator in around
5	Q. Okay. I want to go back to	5	2002, what were your job responsibilities
6	the control cage clerk before you became	6	there?
7	DEA coordinator.	7	A. My main responsibilities
8	What were your job	8	were to make sure that the associates in
9	responsibilities in that position?	9	the cage were adhering to different
10	A. If I remember, most of the	10	procedures and policies within the cage
11	responsibilities were to monitor the	11	and to maintain the inventory, and it
12	billing report and different	12	included correspondence with DEA agents
13	correspondences with other people within	13	and Board of Pharmacy agents, and other
14	the building, and helping out in the	14	clerical things.
15	control cage with whatever was needed	15	
16	from the other associates, and assisting	16	(Whereupon, Exhibit
17	the DEA clerk with whatever I mean, a	17	RiteAid-Chase Exhibit-1,
18	DEA coordinator with whatever she needed.	18	Rite Aid OMDL 0016495-498, was
19	Q. Who was the DEA coordinator?	19	marked for identification.)
20	A. At the time	20	
21	MR. LAVELLE: Object to	21	MR. POWERS: I'll hand you
22	form.	22	what I marked as Exhibit-1. For
23	BY MR. POWERS:	23	the record it's Bates stamped
24	Q. Yeah. At the time you were	24	Rite Aid OMDL 0016495. And it's
	Q. I can: The time time you were		THE THE STADE OUTDING THE RE
	<u> </u>		
	Page 39		Page 41
1	<u> </u>	1	
	Page 39	1 2	-
	Page 39 a control cage clerk, before becoming a		an e-mail with the included attachments. BY MR. POWERS:
3	Page 39 a control cage clerk, before becoming a DEA coordinator.	2	an e-mail with the included attachments.
3 4	Page 39 a control cage clerk, before becoming a DEA coordinator. A. I'm sorry, if you could just	3 4	an e-mail with the included attachments. BY MR. POWERS:
3 4	Page 39 a control cage clerk, before becoming a DEA coordinator. A. I'm sorry, if you could just repeat that.	2 3 4 5	an e-mail with the included attachments. BY MR. POWERS: Q. Just take a second and look over the e-mail, and just let me know
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2 3 4 5 6 7 8	Page 39 a control cage clerk, before becoming a DEA coordinator. A. I'm sorry, if you could just repeat that. Q. Sure. So you said one of your job responsibilities as a control cage clerk, when you were in that position before you	2 3 4 5 6 7 8	an e-mail with the included attachments. BY MR. POWERS: Q. Just take a second and look over the e-mail, and just let me know when you've had a chance to review it. MR. LAVELLE: Are you using any prefix for the exhibit? Are
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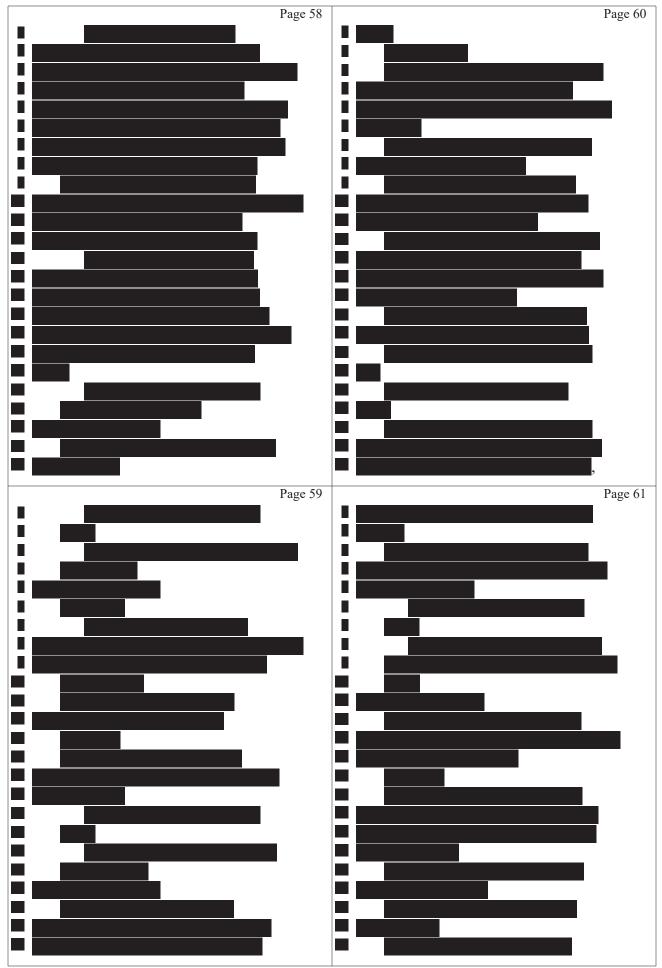
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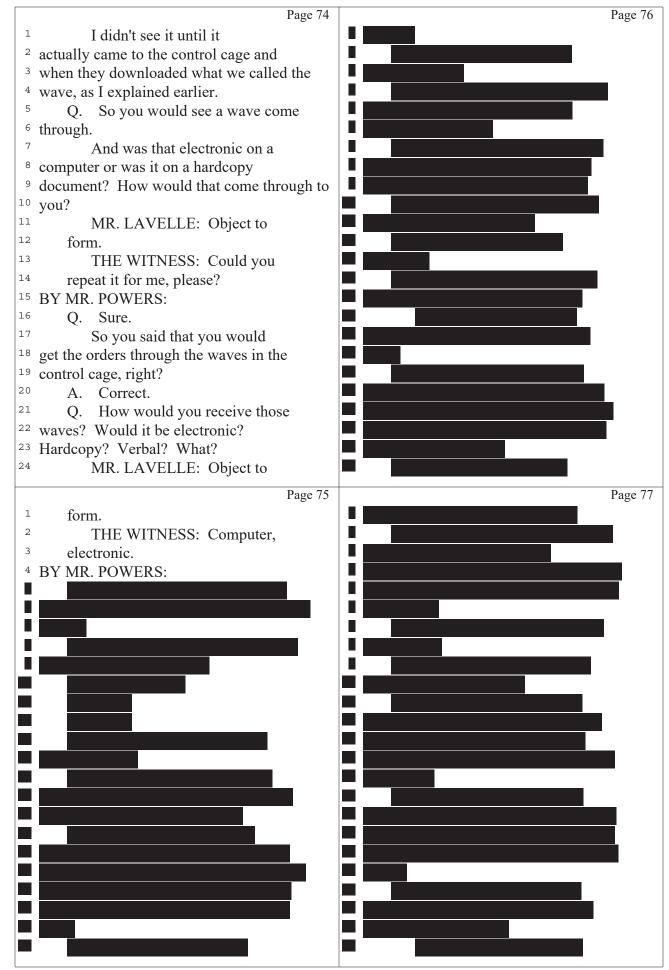




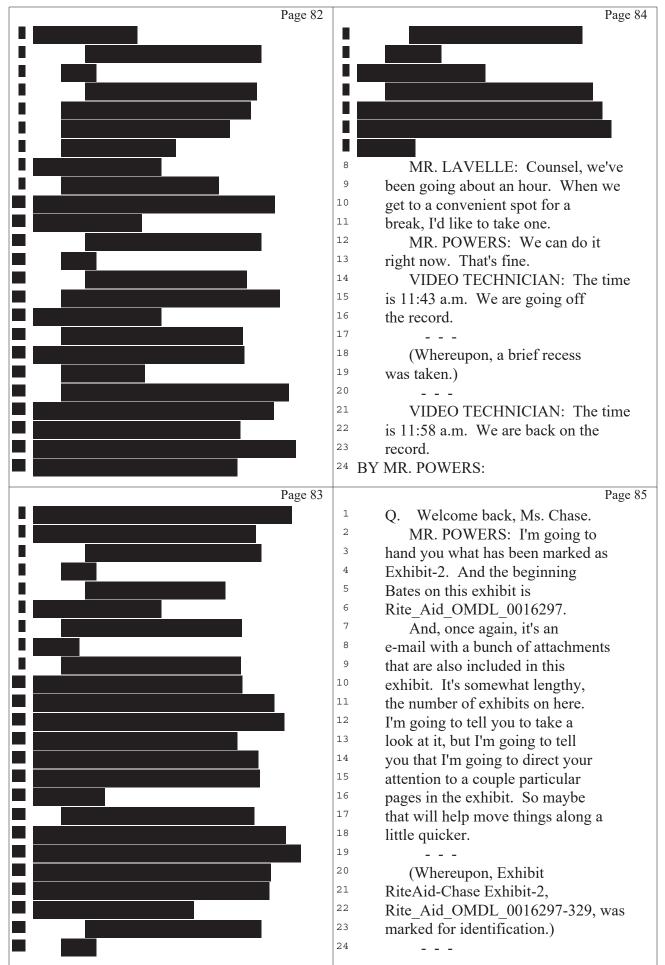


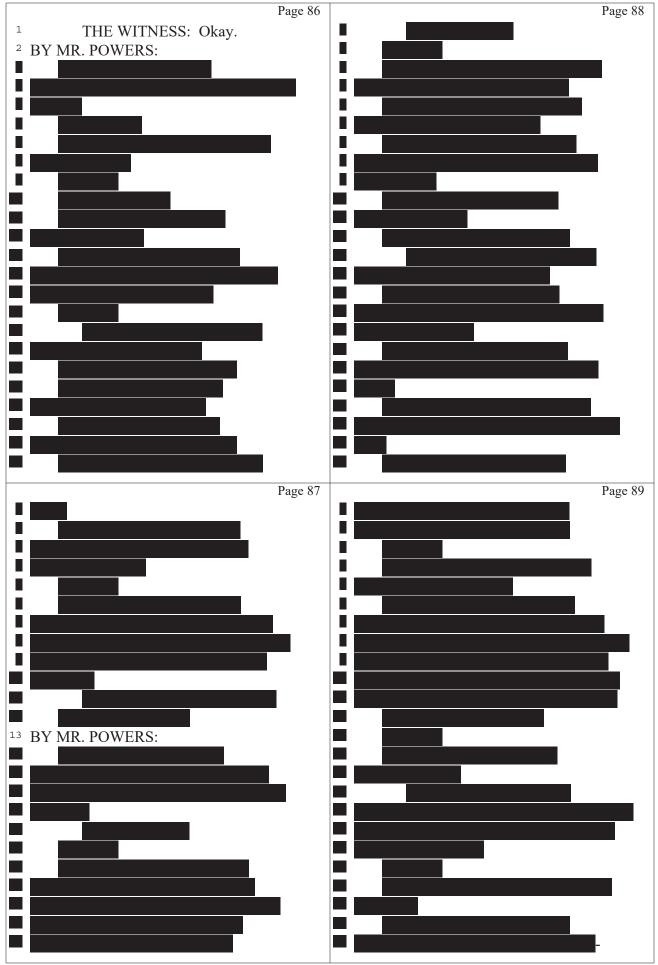


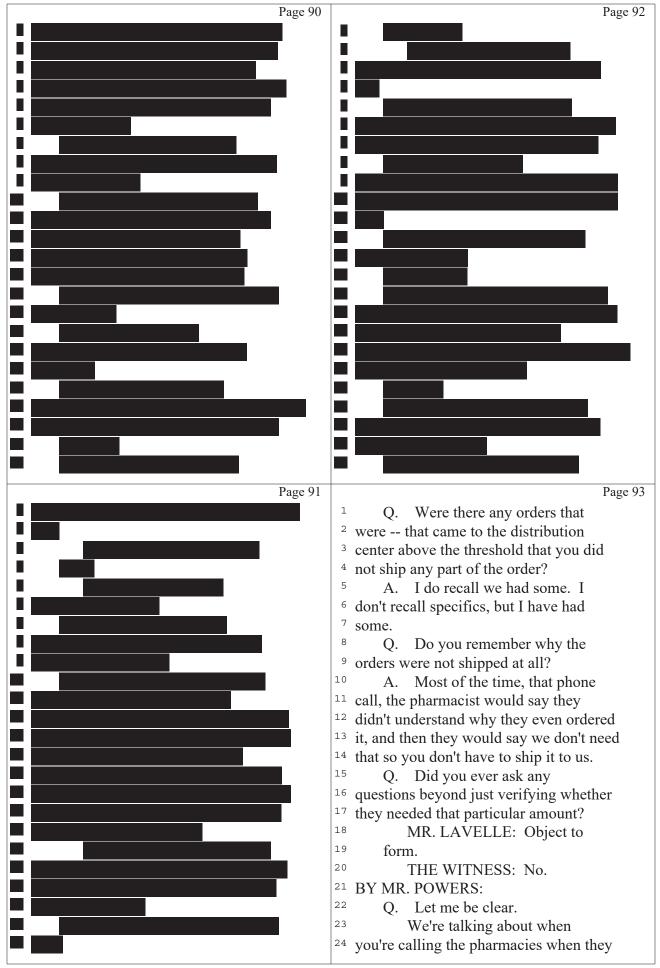
Highly Confidential - Subject (to further confidenciality Review
Page 70	
¹ MR. LAVELLE: Counsel, are	¹ should be.
you finished with Chase-1?	² Q. When you say "we," in an
³ MR. POWERS: Yes.	³ order that we have a question about, do
4 MR. LAVELLE: I'll give it	⁴ you mean Rite Aid?
5 to the court reporter. She needs	⁵ A. Yes. In the context of who
6 to keep all the exhibits.	⁶ was working with me.
⁷ Thank you.	⁷ Q. And you said that it's an
8 BY MR. POWERS:	⁸ order that is possibly not what it should
⁹ Q. Does Rite Aid have an	⁹ be.
¹⁰ obligation to prevent diversion?	What do you mean by that?
11 A. Yes.	11 A. As in if we thought
MR. LAVELLE: Object to	something was going to happen to other
13 form.	13 than what was supposed to, other than
¹⁴ BY MR. POWERS:	going to the pharmacist, or if we thought
Q. Why does Rite Aid have an	15 something was happening with it.
obligation to prevent diversion?	Q. We talked a little bit
MR. LAVELLE: Object to	before about sort of how the operations
18 form.	18 worked at the DC, and I want to just get
¹⁹ THE WITNESS: Could you	¹⁹ clarity on a couple of points.
repeat that? I'm sorry.	The Rite Aid distribution
21 BY MR. POWERS:	21 centers only distributes to Rite Aid
Q. Why does Rite Aid have an	²² stores, correct?
²³ obligation to prevent diversion?	23 A. Yes.
MR. LAVELLE: Object to	Q. And the Rite Aid
Page 71	
¹ form.	¹ distribution centers only distributed
 form. THE WITNESS: As a 	 distribution centers only distributed controlled substances up until 2014,
 form. THE WITNESS: As a distributor, they would have an 	 distribution centers only distributed controlled substances up until 2014, right?
form. THE WITNESS: As a distributor, they would have an obligation to make sure their	 distribution centers only distributed controlled substances up until 2014, right? A. Yes.
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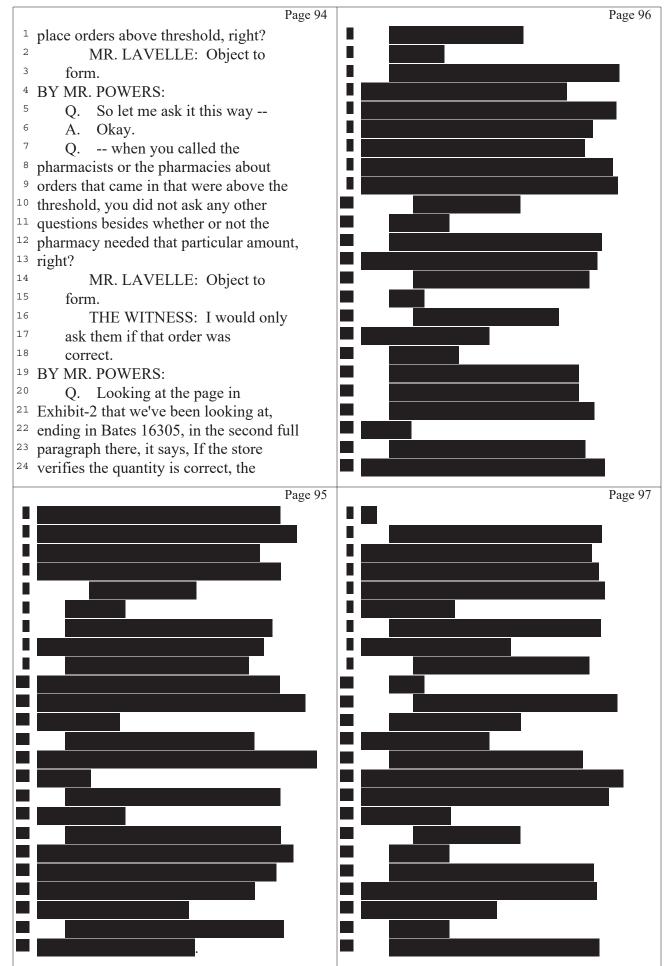


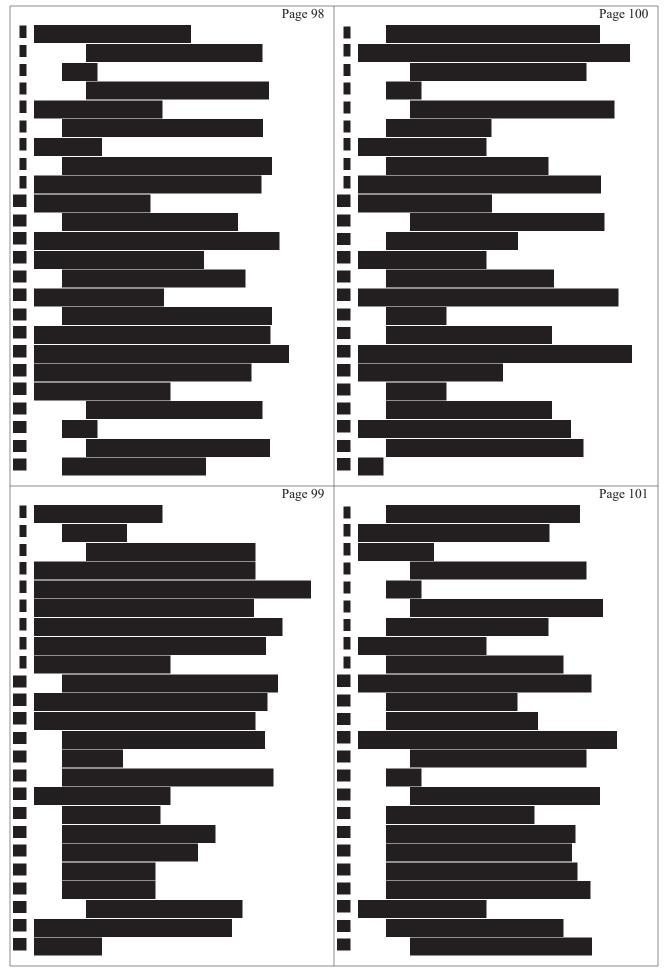


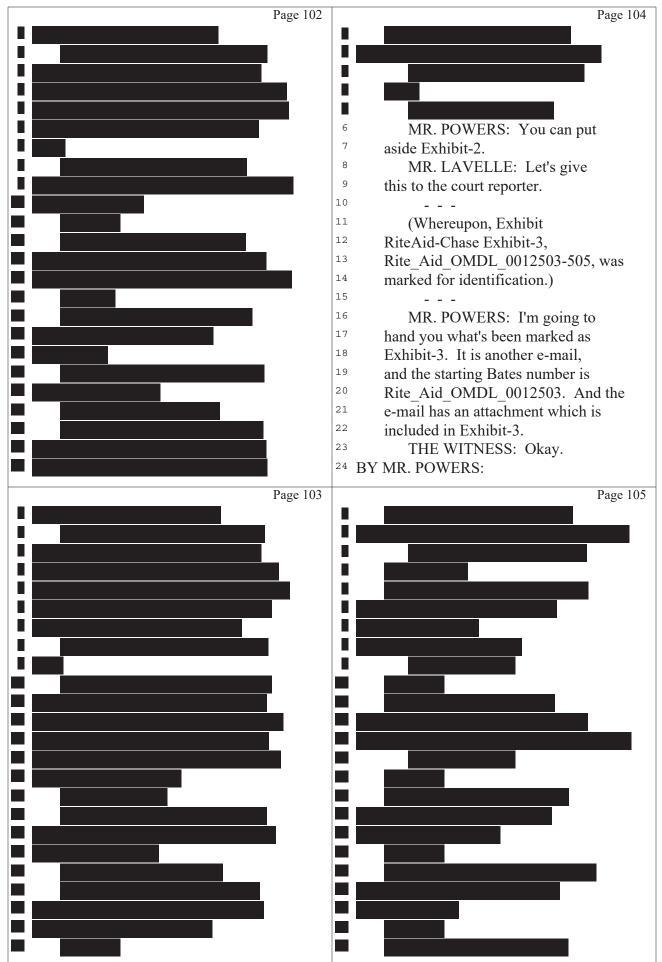




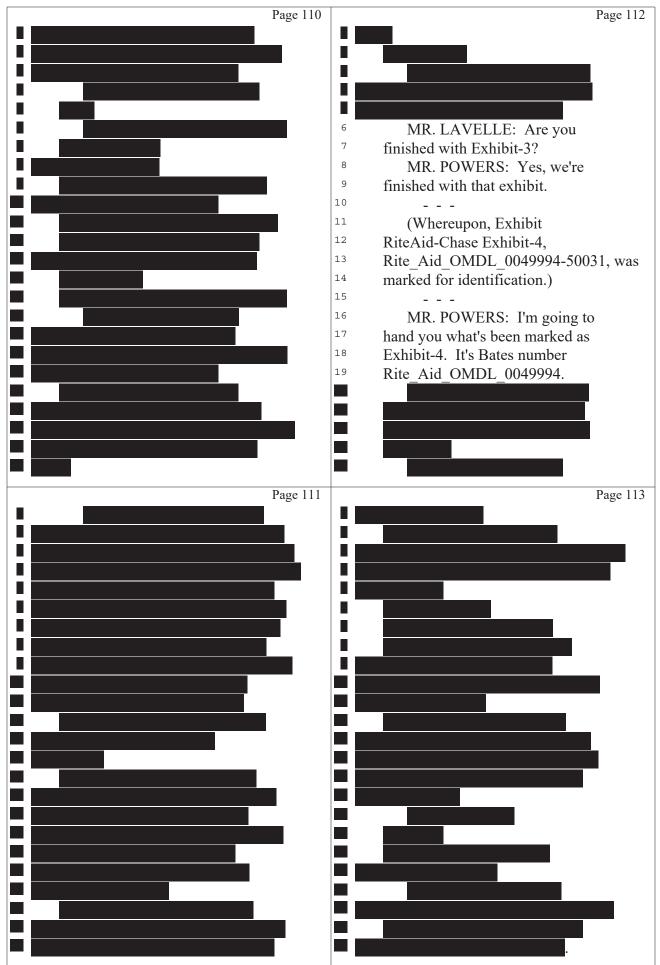


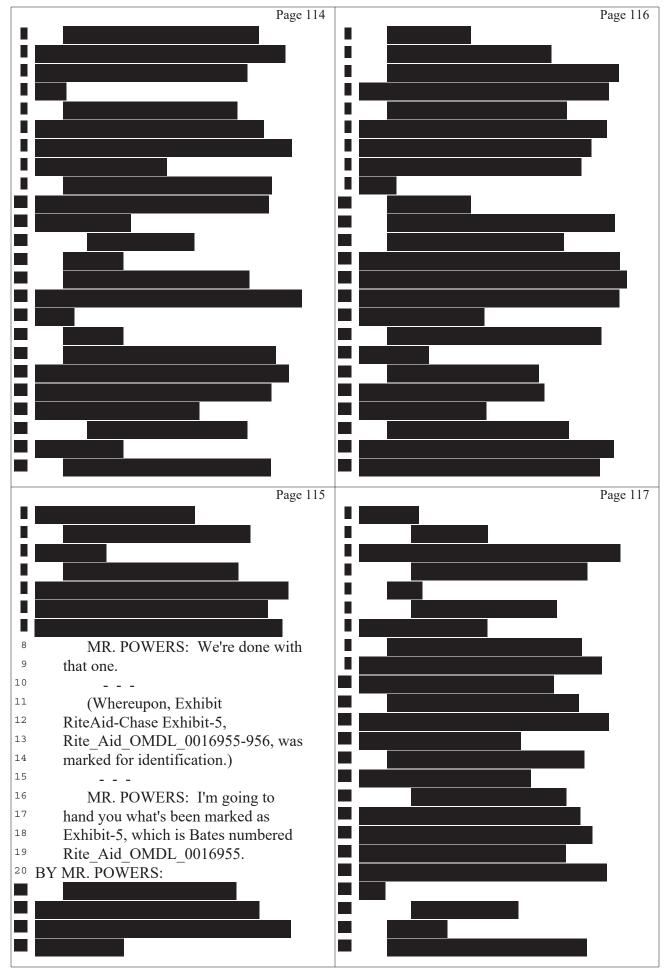






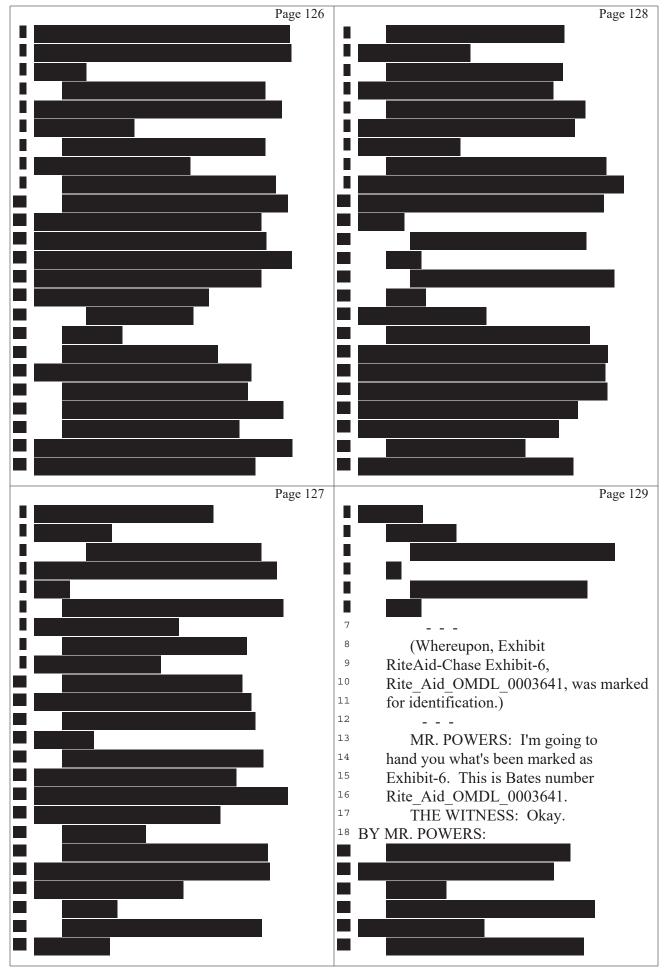






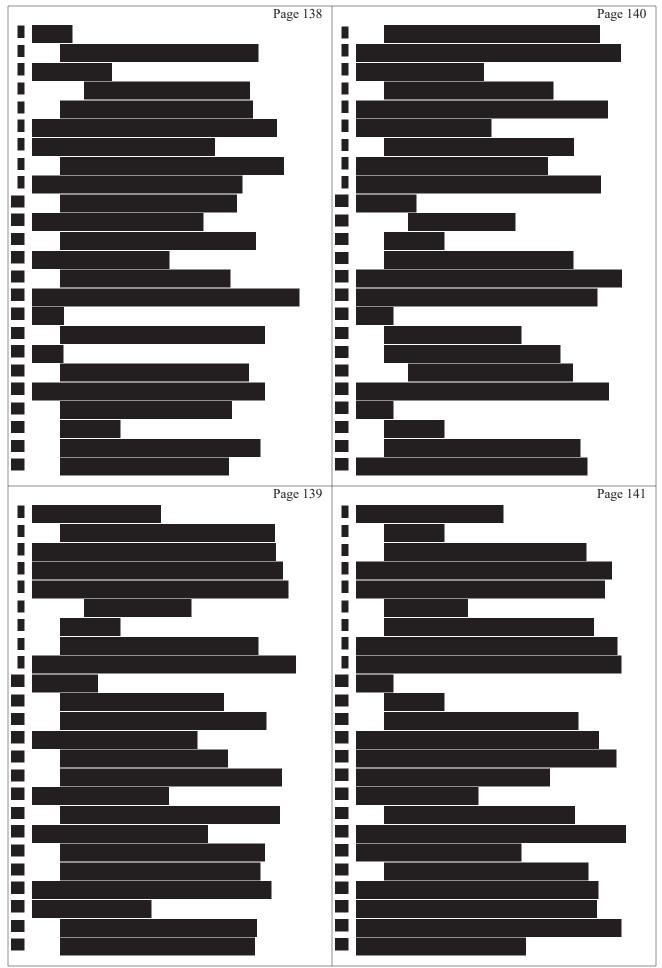




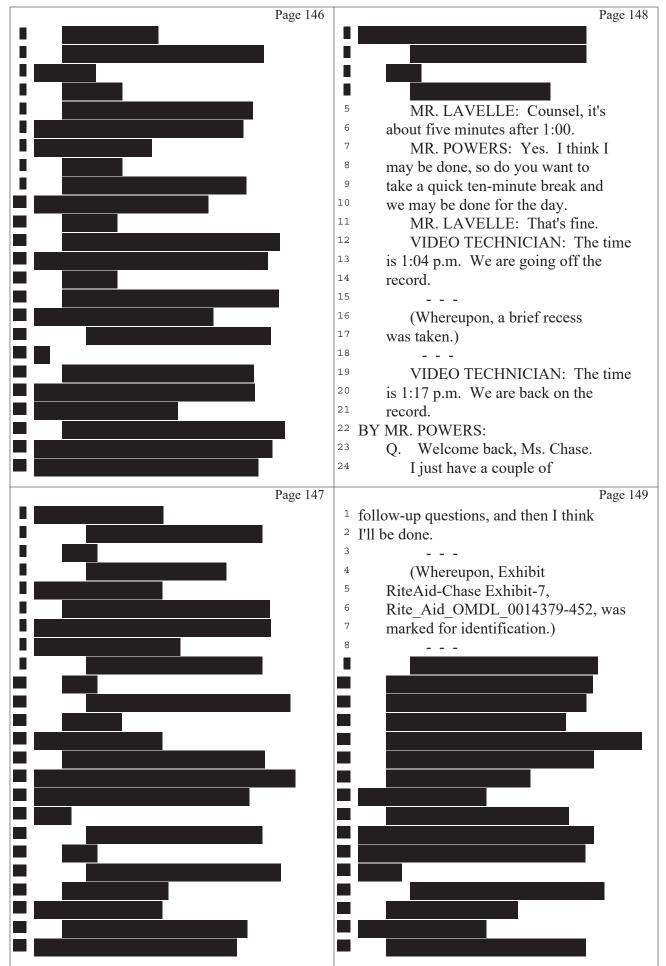




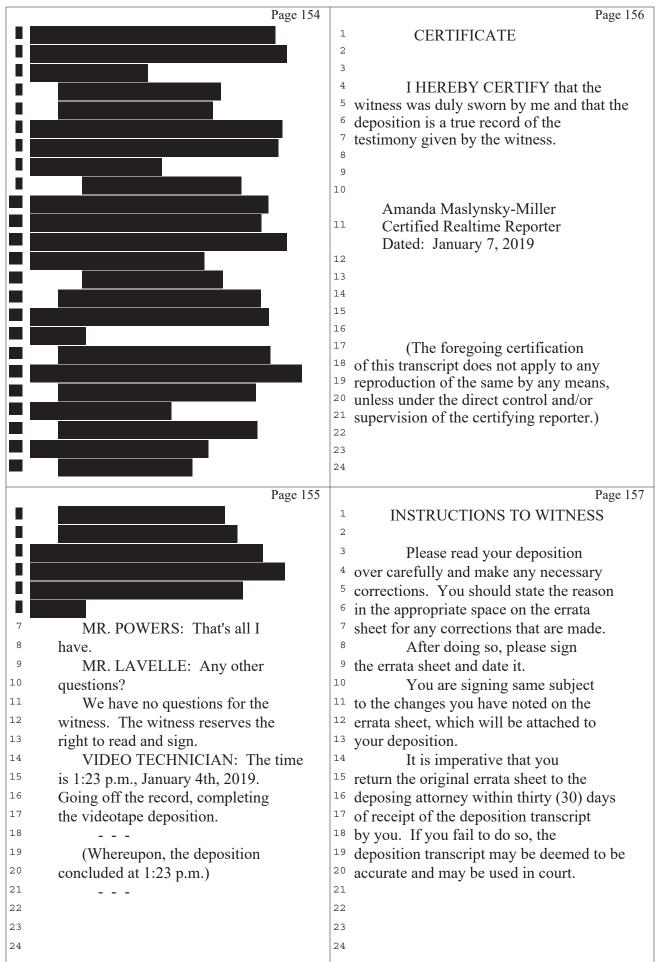












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1	¹ LAWYER'S NOTES
ERRATA	² PAGE LINE
2 DACE I DIE CHANCE/DEACON	3
3 PAGE LINE CHANGE/REASON 4	4
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ACKNOWLEDGMENT OF DEPONENT I,, do hereby certify that I have read the foregoing pages, 1 - 155, and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form or substance, if any, noted in the attached Errata Sheet.	
DEBRA CHASE DATE	
Subscribed and sworn to before me this day of , 20 .	
My commission expires:	
Notary Public 5 6 7	
7 8 9 0	
1 2 3 4	